

REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-22 are currently pending in this application. By this Amendment, Applicants have amended Claims 1, 18 and 21.

In the outstanding Office Action, Claims 1-12, 16, 17 and 18-22 were rejected under 35 U.S.C. 102(e) as being anticipated by Inoue et al. (U.S. Patent No. 6,501,767) (hereinafter Inoue). Claims 13-15 were rejected under 35 U.S.C. 103(a) as being unpatentable over Inoue in view of Kondo et al. (U.S. Patent No. 6,088,725) (hereinafter Kondo).

Claims 1, 18 and 21 have been amended. Support for the amendments for Claims 1, 18 and 21 is found in Fig. 1, for example, where the position identifier processing apparatus 31 is located in mobile computer 3.

Claim 1, as amended, is directed towards a position identifier management apparatus for supporting the movement of a mobile computer between networks, which includes a storage unit for storing binding information concerning the mobile computer managed by the position identifier management apparatus, the binding information including a compatible node identifier for uniquely specifying the mobile computer and a compatible position identifier for uniquely specifying a position of the mobile computer on the network. A registration unit registers the binding information in the storage unit in response to a registration request to register the binding information from another apparatus. A transmitting unit transmits the binding information concerning the mobile computer from another apparatus when the binding information is stored in the storage unit. The position identifier management apparatus is included in the mobile computer.

Turning now to the rejection of Claim 1, Applicants respectfully submit that Inoue fails to disclose all of the elements of Claim 1.

Claim 1 was amended to recite “... wherein the position identifier management apparatus is included in the mobile computer.” Inoue does not disclose that the mobile computer provides the elements for realizing a Mobile IP without a home agent.

Inoue discloses storing the binding information (home address and current address) in a mobile computer location table 51, which is located in the mobile computer management device 5.¹ Fig. 5 of Inoue shows that the mobile computer management device is not part of the mobile computer. Claim 1, as amended, recites that the binding information is stored in the position identifier management system, which is included in the mobile computer.

Claim 1, as amended, recites that there is a “...registration means for registering the binding information in said storage means in response to a registration request to register the binding information from another apparatus....” As the amendment to Claim 1 makes clear, the registration means is in the mobile computer. Inoue does not disclose the above quoted element as being included in the mobile computer. Inoue discloses that the mobile computer management device, which is not included in the mobile computer, registers the binding information transmitted from the mobile computer in order to register the binding information in the storage means provided in the mobile computer management device.²

Claim 1 recites a “...transmitting means for transmitting the binding information in response to a query about the binding information concerning said mobile computer from another apparatus when said binding information is stored in said storage means.” As the amendment to Claim 1 makes clear, the transmitting means is included in the mobile

¹ Inoue col. 12, lines 46-51. See also Inoue col. 4, lines 63-67 and col. 5 lines 1-7.

² Inoue col. 9, lines 14-20.

computer. Inoue does not disclose the above quoted element of Claim 1 as being included the mobile computer. Inoue disclose that in order to return a reply packet corresponding to the registration request to the mobile computer, the mobile computer management device transmits the reply packet.³

Applicants respectfully submit that Claim 1, as amended, (and its dependent Claims 2-5) patentably distinguish over Inoue.

Claim 21 is similar to Claim 1 in that they have both been amended to recite “wherein the position identifier management apparatus is included in the mobile computer. Applicants respectfully submit that Claim 21 be allowed for the same reasons as Claim 1.

Claim 18 is directed to a position identifier processing method. Claim 18 has been amended to recite that each of the steps of “storing,” “acquiring” and converting are performed “at the mobile computer.” Claim 18, as amended, recites “...storing at the mobile computer binding information....” Applicants respectfully submit that Claim 18 (and its dependent Claim 19) be allowed for the same reasons as Claim 1.

Turning now to the rejection of Claims 6 and 22, Applicants respectfully submit that Inoue fails to disclose all of the elements of Claims 6 and 22.

Claims 6 and 22 are directed toward a mobile computer. The mobile computer of Claims 6 and 22 recite “...means for storing binding information...” and “...storage unit configured to store binding information...” respectfully. Inoue discloses storing binding information in a mobile computer management device which is separate from a mobile computer.⁴

³ Inoue col. 10, lines 15-18.

⁴ Inoue col. 12, lines 46-51. See also Inoue col. 4, line 54 to col. 5, line 7.

Claims 6 and 22 are directed toward a mobile computer that comprises a “conversion means” and “conversion unit,” respectively. Thus, the “conversion means” and the “conversion unit” are a part of the mobile computer. Inoue discloses that a relay, labeled Border Gateway 4, has the conversion means so that the communication is routed through the Border Gateway 4.⁵ Fig. 2 shows that the border gateway is not included in the mobile computer.

Claims 6 and 22 recite a “determination means” and a “determination unit” respectively. The Office Action alleges that col. 5 lines 35-45 of Inoue discloses the “determination means” and “determination unit.”⁶ That portion of Inoue only discloses: storing a global address; relaying a packet to be exchanged between one computer connected to the private address space and another computer connected to the global address space; and transmitting to the packet relay device. There is no mention of determining “whether the binding information is to be used for a packet transmitting or receiving operation” as is recited in Claims 6 and 22. Inoue does not disclose a “determination means” or a “determination unit” since a packet is assumed to be transmitted from a mobile computer connected to another network and the packet relay device always converts the packet.

Applicants respectfully submit that Claims 6 (and its dependent Claims 7-15) and 22 patentably distinguish over Inoue.

Turning now to the rejection of Claims 16 and 20, Applicants respectfully submit that Inoue fails to disclose every element of Claims 16 and 20.

Claim 16 is directed to a position identifier management method. The steps of the method are performed by the mobile computer. Claim 16 should be allowed for similar

⁵ Inoue col. 9, lines 39-67.

⁶ Office Action, page 5.

reasons as Claim 1. Claim 16 does not need an amendment to indicate that recited steps are included in the mobile computer. Claim 16 recites: “storing by a mobile computer latest binding information;” “in storage means of said mobile computer;” “specifying by said mobile computer;” and “sending a registration request . . . from said mobile computer.” Inoue does not disclose the above recited steps as being performed by the mobile computer. Inoue, for example, discloses the mobile computer management device, which is external to the mobile computer, as storing the binding information.⁷

Claim 20 is directed to a position identifier processing method for a mobile computer. Claim 20 should be allowed for similar reasons as Claim 1. Claim 20 does not need an amendment to indicate that some of the recited steps are included in the mobile computer. Claim 20 recites “storing binding information . . . in storage means of said mobile computer.” Inoue discloses storing binding information in the mobile computer management device.⁸

Applicants respectfully submit that Claims 16 (and its dependent Claim 17) and 20 patentably distinguish over Inoue.

Turning now to Claims 13-15, which the Officer Action has rejected under 35 U.S.C. §103(a) as being unpatentable over Inoue in view of Kondo et al. (U.S. Patent No. 6,088,725), Applicants respectfully submit that U.S. Patent No. 6,501,767 (Inoue) be disqualified as a reference for the purposes of 35 U.S.C. § 103(a).

Application 09/771,972 and U.S. Patent No. 6,501,767 (Inoue) were, at the time the invention of Application 09/771,972 was made, owned by Kabushiki Kaisha Toshiba.

Accordingly, it is respectfully submitted that Claims 1, 18 and 21, as amended, and Claims 2-17, 19-20 and 22 patentably distinguish over Inoue.

⁷ Inoue col. 12, lines 46-51. See also Inoue col. 4, lines 63-67 and col. 5 lines 1-7.
⁸ Inoue col. 12, lines 46-51. See also Inoue col. 4, lines 63-67 and col. 5 lines 1-7.

Consequently, in view of the above amendments and comments, it is respectfully submitted that the outstanding rejection is traversed and that the pending claims are in condition for allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, P.C.



Eckhard H. Kuesters
Attorney of Record
Registration No. 28,870

Customer Number
22850

Tel: (703) 413-3000
Fax: (703) 413 -2220
(OSMMN 06/04)

EHK/JW/agm
I:\ATTY\JW\202184US\202184US_AM.DOC